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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$22,000.00 IN
U.S. CURRENCY,

15 APPROXIMATELY \$18,000.00 IN
16 U.S. CURRENCY, AND

17 APPROXIMATELY \$9,970.00 IN
18 U.S. CURRENCY,

19 Defendants.

2:23-MC-00423-WBS-DB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimant Jamal
21 Christopher Spratling (“claimant”), by and through their respective counsel, as follows:

22 1. On or about September 21, 2023, claimant filed a claim in the administrative forfeiture
23 proceeding with the Drug Enforcement Administration with respect to the Approximately \$22,000.00 in
24 U.S. Currency, Approximately \$18,000.00 in U.S. Currency, and Approximately \$9,970.00 in U.S.
25 Currency (hereafter collectively “defendant currency”), which was seized on July 6, 2023.

26 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
27 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
28 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other

1 than claimant has filed a claim to the defendant currency as required by law in the administrative
2 forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
5 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
6 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
7 parties. That deadline was December 20, 2023.

8 4. By Stipulation and Order filed December 21, 2023, the parties stipulated to extend to
9 January 19, 2024, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 5. By Stipulation and Order filed January 22, 2024, the parties stipulated to extend to
13 February 20, 2024, the time in which the United States is required to file a civil complaint for forfeiture
14 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
15 subject to forfeiture.

16 6. By Stipulation and Order filed February 20, 2024, the parties stipulated to extend to
17 March 21, 2024, the time in which the United States is required to file a civil complaint for forfeiture
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
19 subject to forfeiture.

20 7. By Stipulation and Order filed March 21, 2024, the parties stipulated to extend to April 19
21 21, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
22 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
23 forfeiture.

24 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
25 to May 20, 2024, the time in which the United States is required to file a civil complaint for forfeiture
26 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
27 subject to forfeiture.

28 9. Accordingly, the parties agree that the deadline by which the United States shall be

required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to May 20, 2024.

Dated: 4/17/2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney


Dated: 4/16/2024

/s/ Curtis Fallgatter
CURTIS FALLGATTER
Attorney for potential claimant
Jamal Christopher Spratling

(Signature authorized by email)

IT IS SO ORDERED.

Dated: April 18, 2024


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE